

# EXHIBIT C

The Honorable Ricardo S. Martinez

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON,

Plaintiff,

v.

ALDERWOOD SURGICAL CENTER,  
LLC, a Washington limited liability  
company; NORTHWEST NASAL  
SINUS CENTER, P.S., a Washington  
professional service corporation, and  
JAVAD A. SAJAN, M.D.,

Defendants.

NO. 2:22-cv-01835-RSM

DECLARATION OF ASH NAVONE

I, Ash Navone, declare as follows:

1. I make this declaration with personal knowledge of the matters set forth herein and, if called upon to testify, I could and would testify competently thereto. My knowledge is based upon my direct personal involvement with Alderwood Surgical Center, LLC, d/b/a Allure Esthetic, d/b/a Gallery of Cosmetic Surgery ("Allure Esthetic"), a Seattle area plastic surgery business run by Dr. Javad Sajan.

2. I live in Seattle, Washington. I came to know of Allure Esthetic from online research. I was looking for a Seattle area plastic surgeon to perform a top surgery. At the time my search in Google brought up two plastic surgeons. I chose to visit Dr. Sajan's website because he had more reviews than the other doctor and his review rating was higher.

1           3.       I was also pleased with Dr. Sajan's before and after photos of top surgeries. The  
2 work looked natural, symmetrical, and very clean and precise. His patients appeared to have  
3 minimal scarring in comparison to before and after photos I had seen elsewhere.

4           4.       I chose to go with Dr. Sajan at Allure Esthetic and set up an appointment. I believe  
5 I paid a \$100 consultation fee. I eventually visited Allure Esthetic's Lynnwood location in early  
6 2019 and met with Dr. Sajan. I recall signing a bunch of documents, one of which was a social  
7 media agreement. My understanding of the agreement was that I could not write anything  
8 negative about Dr. Sajan or Allure Esthetic online. I recall a monetary punishment associated  
9 with the agreement, but do not remember the details.

10          5.       During the consultation Dr. Sajan did a physical exam and indicated I was a good  
11 candidate for a double mastectomy. We discussed insurance in some detail and what to expect  
12 in terms of results. Dr. Sajan explained that often times during top surgeries excess skin forms  
13 at the end of the stitches and those are referred to as "dog tags." He explained it occurs because  
14 doctors are cautious and don't want to be overzealous when removing skin initially. It's hard to  
15 predict exactly how much skin to remove during the surgery. Dr. Sajan explained that often  
16 minor revision surgeries are needed to remove the "dog tags" and if this happened, not to worry,  
17 he would take care of it and it's included in the cost of the surgery.

18          6.       I reviewed his before and after photos again and saw that none of his patients had  
19 the "dog tags" which assured me that he did take care of it. I was aware that "dog tags" are  
20 common in plastic surgery from friends who had plastic surgery in the past. It was a concern  
21 for me.

22          7.       After a series of battles with my insurance carrier, Allure Esthetic managed to get  
23 approval for the surgery. I had surgery on June 26, 2019. I paid approximately \$2,000 up front  
24 and the remainder was to be covered by insurance.

25          8.       By the time of my first follow up visit, the "dog tags" were visible. I brought them  
26 to Dr. Sajan's attention and he stated that everything was too new and would need time to settle

1 and for swelling go down. He suggested I start ultrasound massage therapy. I paid \$400 for each  
2 session of this therapy. I believe I had four sessions of this type of therapy at \$400 per session.  
3 A copy of the receipt for one of those treatments received on July 18, 2019 is attached as  
4 Exhibit A.

5 9. I brought up the “dog tags” and my scarring at another visit and Dr. Sajan stated  
6 I needed to purchase his scar treatment cream which cost \$100. He added, however, that if I gave  
7 him a good review online he would sell the scar cream to me at substantially discounted price. I  
8 agreed and gave him a great review on Google because the cream was expensive, and the  
9 ultrasound massage therapy was not effective. I wanted results like those in Allure Esthetic’s  
10 “after” photos so I concluded I needed the cream. Additionally, I do not like confrontation so I  
11 didn’t voice my discontent to Dr. Sajan about his response and all the additional treatments and  
12 costs which I was not made aware of before the surgery. I left feeling helpless. My results didn’t  
13 look like the results in the photos because of the “dog tags.”

14 10. At the six-month post-surgery mark, the “dog tags” had become even more  
15 apparent. I was concerned and specifically asked Dr. Sajan when the “dog tags” would be  
16 addressed. Dr. Sajan responded, “You are overweight and need to work out to build muscle.” I  
17 was so shocked at his change of direction and demeanor that I didn’t respond but felt bruised by  
18 his words and actions. He did not mention weight loss or lack of muscle mass at the consultation,  
19 pre-op visit, or at any time before surgery and it would have affected my decision to go forward.

20 11. At the one-year post-surgery mark, I brought up the issue of the “dog tags” to Dr.  
21 Sajan again. This time he said, “You are still overweight and didn’t work out to build muscle, so  
22 I am not going to approve the revision surgery.” Once again, I felt lied to and deceived. My  
23 weight had not changed, and losing weight and working out were not criteria he ever discussed  
24 before the surgery. I felt used and defeated, it was my word against his.

25 12. I wanted to write a review and complain to a regulating agency about my  
26 experience, but I remembered the social media agreement. I remembered the document I signed

1 meant I could not post a negative review or discredit Dr. Sajan publicly on any social media  
2 forum or to anyone.

3 13. This became very bothersome to me because I felt like I was letting down other  
4 consumers, especially the queer community, by not being able to share the truth about my  
5 experience. I was torn on what action to take. I knew that within the LGBTQ community we rely  
6 on each other. I wanted to warn everyone that Dr. Sajan doesn't stand by his word, so get  
7 everything in writing. I knew if I had seen bad reviews I would have taken those comments into  
8 consideration when choosing to go with him and Allure Esthetic. It was the fact that he had all  
9 positive reviews that drew me to him and now I knew how he got them.

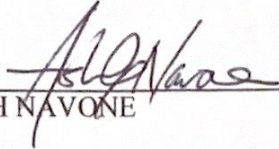
10 14. I started to realize how obvious all of this was, yet I had failed to connect the dots  
11 until then. Once I had surgery, it seemed that Allure Esthetic's primary focus was to get me to  
12 write a good review. Dr. Sajan and his staff asked me to write a good review at each visit. I felt  
13 that they were more concerned about securing a good review than follow-up patient care. I  
14 realized it was after he got a positive review from me that he changed his tone and refused to do  
15 the revision surgery as he had promised. I felt angry and played.

16 15. I discussed my experience and discontent to several of my friends and learned  
17 that others who had surgery with Dr. Sajan had experienced similar issues but also didn't write  
18 a negative review for the same reason. They believe the social media agreement prevents them  
19 from saying anything negative to anyone.

20 16. I run a business myself and I take the bad and good reviews as they come. I want  
21 my customers to tell the truth, and the bad reviews help us to be better business owners and better  
22 serve our customers and community.

23 17. Recently, a friend told me about the press release about the State's case against  
24 Allure Esthetic and Dr. Sajan, which is what made me feel empowered to reach out to the  
25 Attorney General's Office.  
26

1 18. I declare, under penalty of perjury under the laws of the State of Washington, that  
2 the foregoing is true and correct.

3   
4 ASH NAVONE

5 Place Signed: Seattle, WA  
6 City, State

7 Date: 09/14/2023  
8 MM/DD/YYYY

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DECLARATION OF ASH NAVONE - 5  
(2:22-cv-01835-RSM)

ATTORNEY GENERAL OF WASHINGTON  
Consumer Protection Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-7744

# EXHIBIT A



**Allure Esthetic - Seattle Plastic Surgery Center**

3500 188th St. SW STE 670

Lynnwood, WA 98037 US

2062090988

contactus@allureesthetic.com

**BILL TO**

Ash Navone

**SALES RECEIPT 22608****DATE** 07/18/2019**PMT METHOD** QuickBooks Payments-Credit Card

DATE	ACTIVITY	QTY	RATE	AMOUNT
07/18/2019	<b>Esthetician Services:Ultrasound Massage (6 Treatments)</b> Package of 6 ultrasound massages	1	400.00	400.00

TOTAL 400.00

**TOTAL DUE \$0.00**